

Exhibit A

Citi Transferee Defendants' Comparison Chart of Document Requests

No.	Category	Trustee's Proposed Document Requests	Citi Rule 2004 Subpoena, July 2009
1.	Due Diligence	<ul style="list-style-type: none"> • “Documents concerning . . . due diligence . . . involving BLMIS, Feeder Funds, or BLMIS-Related Investment Products.” (1)* 	<ul style="list-style-type: none"> • “[D]ocuments concerning any due diligence” conducted concerning BLMIS. (22)** • “[D]ocuments concerning any due diligence” conducted concerning any Fund with a BLMIS Account. (23) • “[D]ocuments concerning any due diligence on BLMIS performed by any investment bank or financial institution” (49)
2.	Ongoing Monitoring of Investments & Transactions	<ul style="list-style-type: none"> • “Documents concerning the . . . ongoing monitoring of actual or prospective investments and transactions involving BLMIS, Feeder Funds, or BLMIS-Related Investment Products.” (1) • Exemplars of documents include documents discussing “performance or purported returns,” “communications” with BLMIS or Feeder Funds, “audit information,” and “regulatory filings.” (1) 	<ul style="list-style-type: none"> • “[D]ocuments concerning BLMIS.” (2) • “[D]ocuments concerning communications between you and BLMIS,” “between you and any Fund with a BLMIS account,” “with any person, other than BLMIS, concerning BLMIS,” or “concerning any Fund with a BLMIS Account.” (15-16; 18-19) • “[D]ocuments concerning any communication . . . concerning any of BLMIS’ accountants, auditors, accounting firms, or auditing firms” (40)

* This number corresponds to the enumerated document requests in the Trustee’s Proposed Document Requests.

** This number corresponds to the enumerated document requests in the Citi Rule 2004 Subpoena.

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			<ul style="list-style-type: none"> • “[D]ocuments concerning any of BLMIS’ accountants, auditors, accounting firms, or auditing firms” (41) • “[D]ocuments concerning comparison of the return on investment you received from accounts with, or managed by, BLMIS, and the return on investment any other person received from accounts with, or managed by, BLMIS.” (42) • “[D]ocuments concerning BLMIS’ Form 13F filings with the Securities and Exchange Commission.” (45)
3.	Investment Decisions	<ul style="list-style-type: none"> • “Documents concerning Defendant(s)’ investment decision, evaluation, approval, disapproval . . . of any investments or transactions involving BLMIS, Feeder Funds, or BLMIS-Related Investment Products.” (2) 	<ul style="list-style-type: none"> • “[D]ocuments concerning your investments in shares of any Fund with a BLMIS Account.” (5) • “[D]ocuments concerning any actual or proposed investments” in accounts managed by BLMIS, or with any Fund with a BLMIS Account. (9-10)
4.	Risk Analysis	<ul style="list-style-type: none"> • “Documents related to any . . . investment advice” or “risk analysis.” (2) 	<ul style="list-style-type: none"> • “[D]ocuments concerning any opinions, research, or advice concerning investments with BLMIS” (50)
5.	Illegality or Insolvency	<ul style="list-style-type: none"> • “Documents concerning fraud, Ponzi, illegality, front-running, investigations, insolvency, or embezzlement at BLMIS or Feeder Funds.” (3) 	<ul style="list-style-type: none"> • “[D]ocuments concerning BLMIS’ financial condition, solvency, or ability to timely pay its debts.” (34) • “[D]ocuments concerning the legality of BLMIS’ operations.” (38)

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			<ul style="list-style-type: none"> • “[D]ocuments concerning the feasibility of BLMIS’ returns on investments.” (39) • “[D]ocuments concerning any . . . investigation of BLMIS by any government agency or official” and “documents concerning any communication between you and any government agency or official” (43-44)
6.	Remuneration	<ul style="list-style-type: none"> • “Documents concerning fees, rebates, commissions, retrocessions, or any other remuneration paid to or by Defendant(s), related to investments and transactions involving BLMIS, Feeder Funds, or BLMIS-Related Investment Products.” (4) 	<ul style="list-style-type: none"> • “[D]ocuments concerning any remuneration received by you . . . in the form of commissions, management fees, performance fees, shares, salary, or any other form of payment” resulting from “investments in accounts with, or managed by, BLMIS” or from “any Fund with a BLMIS Account.” (25-26)